Docket No.: 320529195US5

(PATENT)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:

Tyson-Quah et al.

Application No.: 10/815,190

Confirmation No.: 7517

Filed: March 31, 2004

Art Unit: 3696

For: REDUCING RISK IN A PAYMENT-BASED

TRANSACTION BASED UPON AT LEAST ONE USER-SUPPLIED RISK PARAMETER INCLUDING A CLEAN PAYMENT LIMIT Examiner: F. Poinvil

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

MS Issue Fee Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

Sir:

In the Notice of Allowability mailed December 28, 2009, the Examiner allowed claims 57-84. Applicant acknowledges Examiner's statements of Reasons for Allowance of the above-referenced patent application and agrees that the claimed subject matter is patentable. However, Applicant takes no position regarding the Reasons for Allowance presented by the Examiner other than the positions Applicant may have previously taken during prosecution. Therefore, the Examiner's Reasons for Allowance should not be attributed to Applicant as an indication of the basis for

Application No.: 10/815,190 Docket No.: 320529195US5

Applicant's belief that the claims are patentable. Furthermore, Applicant respectfully asserts that there may also be additional reason for patentability of the claimed subject matter not explicitly stated in this record and Applicant does not waive its rights to such arguments by not further addressing such reasons herein.

Dated: March 26, 2010

Respectfully submitted,

Davin Chin

Registration No.: 58,413

PERKINS COIE LLP

P.O. Box 1247

Seattle, Washington 98111-1247

(206) 359-8000

(206) 359-7198 (Fax)

Attorney for Applicant